

KEEGAN, WERLIN & PABIAN, LLP

ATTORNEYS AT LAW
21 CUSTOM HOUSE STREET
BOSTON, MASSACHUSETTS 02110-3525

(617) 951-1400

TELECOPIERS:
(617) 951- 1354
(617) 951- 0586

November 9, 2000

Mary L. Cottrell
Secretary
Department of Telecommunications and Energy
One South Station, 2nd Floor
Boston, Massachusetts 02110

Re: Notice of Inquiry into Service Quality Standards, D.T.E. 99-84

Dear Secretary Cottrell:

Enclosed please find the original and 20 copies of the Joint Comments of the ten-investor-owned natural gas local distribution companies¹ and five investor-owned electric distribution companies² (together, the "Utility Companies") submitted in response to the proposed guidelines issued by the Department of Telecommunications and Energy ("Department") in the above-referenced proceeding. Although the proposed guidelines establish an appropriate framework for service-quality efforts undertaken in relation to PBR plans, there are difficult technical issues that the Department needs to explore further in relation to the implementation and administration of these efforts.

The Utility Companies have attempted in these comments to address those technical aspects. The Utility Companies appreciate the additional time allowed by the Department. This extension has allowed the Utility Companies to prepare a more comprehensive analysis of these important issues.

¹ Bay State Gas Company, The Berkshire Gas Company, Blackstone Gas Company, Boston Gas Company, Colonial Gas Company, Commonwealth Gas Company, Essex Gas Company, Fall River Gas Company, Fitchburg Gas and Electric Light Company and North Attleboro Gas Company (collectively, the "LDCs").

² Boston Edison Company, Cambridge Electric Light Company, Commonwealth Electric Company, Fitchburg Gas and Electric Light Company and Western Massachusetts Electric Company (collectively, the "Electric Companies").

Thank you for your attention to this matter.

Sincerely,

Robert J. Keegan

Enclosure

cc: George B. Dean, Assistant Attorney General